

19/815

RECEIVED
APR 13 2008
P.O. BOX 1422
FLORENCE, SOUTH CAROLINA 29503

JOHN S. DeBERRY
ATTORNEY AT LAW
179 SOUTH COIT STREET
P.O. BOX 1422
FLORENCE, SOUTH CAROLINA 29503

PS 30
DOCKETING DEPT.
TELEPHONE 843-662-0435
FAX 843-667-0705

April 7, 2008

Charles L.A. Terreni
Chief Clerk & Administrator
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Office of Regulatory Staff vs. Respondents Listed in Exhibit A in
the Petition for a Rule to Show Cause
Docket No.: 2008-50-T

Dear Sir/Madam:

Enclosed please find the original and one copy of the Answer relative to the above referenced case. It would be appreciated if you would file the original and return a certified copy to me in the enclosed self-addressed stamped envelope provided for your convenience.

By copy of this letter, I am serving a copy of the Answer together with Certificate of Service, on the following:

Public Service Commission of South Carolina
Attn: Docketing Department
Post Office Drawer 11649
Columbia, SC 29211

Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211

With kindest regards, I am

Yours very truly,


JOHN S. DeBERRY

JSD/mrs

Enclosure

DOCKET NO. 2008-50-T

CERTIFICATE OF SERVICE

Margaret Rose Sims
Margaret Rose Sims, Secretary to
John S. DeBerry
Attorney for Respondent, Irvin Brown
179 South Coit Street
Post Office Box 1422
Florence, South Carolina 29503
(803) 662-0435

BEFORE
THE SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2008-50-T

IN RE:	Office of Regulatory Staff,)	
)	
	Petitioner,)	
)	
	vs.)	ANSWER
	Respondents Listed in Exhibit A in the)	
	Petition for a Rule to Show Cause,)	
)	
	Respondents.)	

The Respondent, Irvin Brown, answering the Petition of the Petitioner, herein alleges:

1. That the Respondent, Irvin Brown, specifically denies each and every allegation alleged in the Petition, except as hereinafter specifically admitted, explained or qualified.
2. That the Respondent, Irvin Brown, admits paragraph One (1).
3. That the Respondent, Irvin Brown admits paragraphs Two (2), Three (3), Four (4), Five (5) and Six (6) as these paragraphs pertain to him.
4. That the Respondent, Irvin Brown, admits paragraph Seven (7). See answer to Paragraph Eight (8) below for explanation.
5. That Respondent, Irvin Brown, responds to paragraph eight (8) as follows: He has a business of one single cab that was struck and destroyed by an at fault third party. The Respondent, Irvin Brown has had difficulty collecting from the at fault parties to replace his vehicle. He has retained the services of John S. DeBerry, attorney and is in the process of collecting monies due him to replace his cab and continue his livelihood as a licensed cab/owner operator.

6. That the Respondent, Irvin Brown, admits paragraph Nine(9) as it pertains to him but denies that any willful violation has occurred on his part.

WHEREFORE, your Respondent, Irvin Brown, prays that he be allowed sufficient time to have his vehicle replaced and to continue as an owner/operator and that it be ruled that he is in compliance.

Florence, South Carolina

Date: April 7, 2008



JOHN S. DEBERRY

Attorney for Respondent, Irvin Brown
179 South Coit Street
Post Office Box 1422
Florence, South Carolina 29503
(803) 662-0435